

EXHIBIT C

Charu Desai vs
UMASS Memorial Medical Center, Inc., et al.

Max P. Rosen, M.D.
May 07, 2021

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1 thoracic radiologist. So you could argue that the
2 appropriate comparison would've been against a board
3 certified thoracic or -- or fellowship trained,
4 rather, there's no board -- a fellowship-trained
5 thoracic radiologist.

6 Q. So, you pulled, or had pulled, 25 random
7 chest CTs of Dr. Desai's and 25 chest CTs dictated by
8 other attendings.

9 what did you do with them, then?

10 A. I asked that they were loaded into a system
11 called LifeImage, which is a -- a cloud-based image
12 sharing system. And also had the reports
13 de-identified, so there was no patient name, medical
14 record number and no indication of who the radiologist
15 was who read it. And the file room team identified --
16 matched each study, each image, with the report by a
17 number, 001, 002, 003, so the reports could be linked
18 with the images.

19 Q. Then what?

20 A. So I, then, identified a thoracic radiologist
21 who was willing to review these studies, and the
22 instructions that I gave them was that I had 50 chest
23 CTs with de-identified reports that I would like them
24 to review. I did not tell them how many were from one

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1 person versus the comparative group or anything else.

2 It was 50 chest CTs to be read.

3 And I asked the person to report whether they
4 agreed or disagreed with the interpretation. If they
5 disagreed with the interpretation, whether it was a --
6 in their opinion, a minor disagreement or a major
7 disagreement, and whether or not that agree -- whether
8 or not that disagreement would have an impact on
9 patient care, in their opinion.

10 Q. Do you recall who you identified as the
11 radiologist to do this review?

12 A. Yes.

13 Q. Who was that?

14 A. Dr. Litmanovich.

15 Q. How did you identify her?

16 A. She has a reputation of being a good thoracic
17 radiologist and that she is somebody who I worked in
18 the same department with years ago. And so I knew
19 that she was, you know, well-respected, competent,
20 and, if she agreed to do something, that she would,
21 you know, carry through on the project.

22 Q. Where was it that you worked together?

23 A. Beth Israel Deaconess.

24 MR. WAKEFIELD: Let's go off the record